

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA (Pittsburgh)

FILED  
5/17/23 4:45 pm  
CLERK  
U.S. BANKRUPTCY  
COURT - WDPA

IN RE:  
RONALD S. JONES  
Debtor

Case No. 17-22147-GLT

RONALD S. JONES,  
Movant

Chapter 11

Related Dkt. Nos. 269 and 289

vs.  
Freedom Mortgage Corporation,  
Respondent

**STIPULATION IN SETTLEMENT OF DEBTOR'S OBJECTION TO CLAIM OF  
FREEDOM MORTGAGE CORPORATION**

It is hereby stipulated by and between Brock & Scott, PLLC, counsel for the Respondent, Freedom Mortgage Corporation, and Donald R. Calaiaro, Esquire and Andrew Kevin Pratt, Esquire, counsel for the Debtor, as follows:

**WHEREAS**, Movant is Ronald S. Jones, the Debtor in the above-captioned bankruptcy case;  
and

**WHEREAS**, Respondent is a secured creditor and holds a mortgage lien against Debtor's primary residence;

**WHEREAS**, Respondent filed a proof of claim on May 16, 2022 and an amended proof of claim on June 28, 2022, Claim No. 16;

**WHEREAS**, On January 4, 2023, Movant filed an Objection to the Claim; and

**WHEREAS**, A Response to the Objection was filed on February 6, 2023.

**NOW THEREFORE**, the Parties stipulate and agree as follows:

1. Debtor has cured the principal and interest payments as stated in the proof of claim.
2. The loan is currently due for the April 1, 2023 payment in the amount of \$2,503.85.

3. Respondent agrees to waive \$1,498.93 of fees and costs consisting of:
  - a. Property Inspections: \$150.00
  - b. 05/02/22 – Obj to Plan fee – remaining balance of \$48.93
  - c. 05/16/22 – POC Fee - \$550.00
  - d. 07/31/22 – Obj to Plan - \$500.00
  - e. 02/28/23 – Obj to Plan - \$250.00
4. The Parties agree that the total amount currently due is \$4,455.09, comprised of the April 2023 monthly payment of \$2,503.85, escrow shortage of \$2,104.31 (as stated in the proof of claim), less Debtor's suspense in the amount of \$153.07.
5. The Parties further agree that Debtor will cure the amount of \$4,455.09 by making twenty-four (24) consecutive payments, as follows: twenty-three (23) payments due June 1, 2023 to April 1, 2025 in the amount of \$185.63, and one (1) payment due May 1, 2025 in the amount of \$185.60.
6. Debtor may pay off the arrears at any time before the conclusion of the 24 months without penalty.
7. Debtor agrees that in addition to the cure payments stated above, Debtor is still responsible for ongoing regular monthly mortgage payments beginning with the May 1, 2023 payment.
8. Movant's tendering of a check to Freedom Mortgage Corporation, which is subsequently returned due to insufficient funds in the account upon which the check is drawn, shall not constitute payment as the term is used in this Stipulation.

9. The parties agree that a facsimile signature shall be considered an original signature.

CONSENTED TO BY:

Dated: 5/17/2023

/s/ Andrew Pratt  
Andrew Pratt, Esquire  
Counsel for Debtor

Dated: 5/17/2023

/s/ Mario Hanyon  
Mario J. Hanyon, Esquire  
Counsel for Respondent


IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA (Pittsburgh)

IN RE: RONALD S. JONES Debtor	Case No. 17-22147-GLT
RONALD S. JONES, Movant	Chapter 11  Hearing Date: May 1, 2023  Hearing Time: 10:30AM  Objection Date: February 6, 2023
vs. Freedom Mortgage Corporation, Respondent	11 U.S.C. §362

**ORDER**

**AND NOW**, this 17th day of May, 2023, it is hereby **ORDERED** that the corresponding Stipulation is hereby approved, shall be, and is hereby made an Order of this Court.

Dated: 5/17/23

  
\_\_\_\_\_  
Honorable Gregory L. Taddonio hct  
United States Bankruptcy Judge

In re:  
Ronald S. Jones  
Debtor

Case No. 17-22147-GLT  
Chapter 11

## CERTIFICATE OF NOTICE

District/off: 0315-2  
Date Rcvd: May 18, 2023

User: auto  
Form ID: pdf900

Page 1 of 2  
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on May 20, 2023:

Recip ID	Recipient Name and Address
db	+ Ronald S. Jones, 3307 Waterford Drive, Pittsburgh, PA 15238-1151

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

## NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: May 20, 2023

Signature: /s/Gustava Winters

## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on May 18, 2023 at the address(es) listed below:

Name	Email Address
Andrew Kevin Pratt	on behalf of Debtor Ronald S. Jones apratt@c-vlaw.com kmosur@c-vlaw.com;ssimmons@c-vlaw.com;jadam@c-vlaw.com;akpratt.ecf@outlook.com
Aurelius P. Robleto	on behalf of Attorney Robleto Law PLLC apr@robletolaw.com, rmk@robletolaw.com,ecf_admin@robletolaw.com,apr@ecf.courtdrive.com,G16422@notify.cincompass.com
Brian Nicholas	on behalf of Creditor Toyota Motor Credit Corporation as servicer for Toyota Lease Trust bnicholas@kmlawgroup.com
Donald R. Calaiaro	on behalf of Defendant Ronald S. Jones dcalaiaro@c-vlaw.com kmosur@c-vlaw.com;ssimmons@c-vlaw.com;jadam@c-vlaw.com;apratt@c-vlaw.com;mpeduto@c-vlaw.com;mlocke@c-vlaw.com;eballa@c-vlaw.com
Donald R. Calaiaro	on behalf of Debtor Ronald S. Jones dcalaiaro@c-vlaw.com

District/off: 0315-2

User: auto

Page 2 of 2

Date Rcvd: May 18, 2023

Form ID: pdf900

Total Noticed: 1

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Thomas Song

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TOTAL: 22